

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE DISTRICT OF PUERTO RICO**

IN RE:

ANGEL RAFAEL CENTENO LUNA

DEBTOR

CASE NO. 15-07614 MCF

CHAPTER 13

**DEBTOR'S OPPOSITION TO TRUSTEE'S REQUEST ENTRY OF ORDER  
DOCKET NO. 23**

TO THE HONORABLE COURT:

**NOW COMES, ANGEL RAFAEL CENTENO LUNA**, the Debtor, through the undersigned attorney, and very respectfully states and prays as follows:

1. On December 12, 2019, the Chapter 13 Trustee filed a *Trustee's Request Entry of Order*, Docket No. 23, whereby the Trustee requests the Court to Order the Debtor to tender to the Trustee the 2015, 2017 and 2018 tax refunds in the sum of \$1,788.00.

2. That on this same date, December 19, 2019, the Debtor filed a *Debtor's Motion Requesting Order Re: Ratification of Use of Funds From the 2015 and 2017 Tax Refunds* and also filed a *Debtor's Motion Requesting Order Re: Authorization to Use Funds From 2018 Tax Refund*, in the above captioned case.

3. The Debtor respectfully states that should the Court grant the Debtor's request for the ratification and authorization to use the funds from the 2015, 2017 and 2018 tax refunds, the Trustee's request for the Court to Order the Debtor to tender the aforementioned tax refunds, becomes "moot".

4. Based on the above stated grounds, the Debtor respectfully requests this Honorable Court to deny the *Trustee's Request for Entry of Order*, Docket No. 23, in the above captioned case.

**WHEREFORE**, the Debtor, through the undersigned attorney respectfully requests that this Honorable Court grant the foregoing motion and deny the Trustee's request for entry of Order, Docket No. 23, in the above captioned case.

I CERTIFY that on this same date a copy of this motion was filed with the Clerk of the Court using the CM/ECF system which will send notice of same to the Chapter 13 Trustee, Jose R. Carrion Morales, Esq.; and to all CM/ECF participants; I also certify that a copy of this motion was sent to the Debtor via US Mail to Angel Rafael Centeno Luna, PO Box 1697 Cidra PR 00739.

**RESPECTFULLY SUBMITTED.** In San Juan, Puerto Rico, this 19<sup>th</sup> day of December, 2019.

/s/ Roberto Figueroa Carrasquillo  
USDC #203614  
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